

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:)	
)	Chapter 11
The Philadelphia Orchestra Association)	
)	Case No. 11-13098 (ELF)
Academy of Music of Philadelphia, Inc.)	
)	Jointly Administered
)	
Debtors.)	

MEDIATION STIPULATION

The Philadelphia Orchestra Association (the “POA”) and AFM Local 77 (the “Union”),
through their undersigned and authorized counsel, hereby agree as follows:

1. The parties will engage in a non-binding mediation with regard to their collective bargaining agreement and their ongoing efforts to reach a successor agreement and offer September 14, 15, and 16, 2011 as the dates for that mediation;
2. The parties will propose that the mediation take place before a designated bankruptcy judge from the United States Bankruptcy Court for the Eastern District of Pennsylvania, to be appointed in accordance with applicable Bankruptcy Court procedures;
3. Subject to ratification by the Musicians, which the parties shall recommend, the collective bargaining agreement expiration date will be extended by the parties, and both sides will sign all necessary and appropriate agreements and take all necessary and appropriate steps in order to do so, from its current expiration date of November 18, 2011 through the end of the day on December 2, 2011;

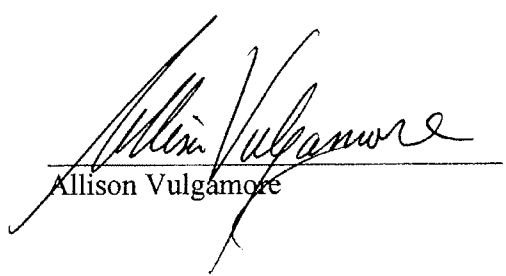
4. The POA will not file any petition under Section 1113 seeking discharge of the collective bargaining agreement between the parties before the later of September 19, 2011 or the conclusion of the mediation;
5. The hearing on any petition filed under Section 1113 will commence, if necessary and in the event of a Section 1113 filing, during the week of October 3, 2011 or not less than 14 days after the filing of the motion if it is filed later than September 19, 2011;
6. The Union will not file any new unfair labor practice charges, amendments, or allegations with the NLRB between the execution of this Mediation Agreement and the conclusion of the mediation described herein; and
7. The notice periods to the Union and to the Musicians with regard to any filing of a petition under Section 1113 will be carried forward to these new filing and hearing dates (as per the earlier agreement extending the collective bargaining agreement through that November 18, 2011 date).

AFM Local 77

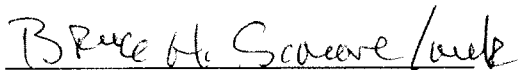
Philadelphia Orchestra Association



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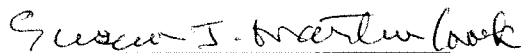


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